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July 28, 2022

**VIA ECF**

Honorable Michael A. Hammer  
United States District Court for the  
District of New Jersey  
Martin Luther King Courthouse  
50 Walnut Street Room 2C  
Newark, NJ 07101

**Re: *United States v. Matthew Goetsche, et al., 19-CR-877 (CCC)*  
Proposed Modification of Pretrial Release Order**

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of Defendant Matthew Goetsche. We respectfully move to modify his bail conditions to allow him to attend any of his children's sports games with a third-party custodian. Each game, including time and location, must be pre-approved by Pretrial. The Court previously approved attendance on weekends only (dkt. 240). The Court's Order Setting Conditions of Release (dkt. 171) requires Mr. Goetsche remain at his residence under home incarceration and that he "shall remain in the presence of a third-party custodian at all times unless otherwise approved by Pretrial Services." The Court previously approved other proposed consent bail modifications to these conditions (dkts 187, 193, 225, and 229).

Pretrial Services has no objection to this proposed request. The government, through AUSA Jamie Hoxie, defers to Pretrial Services. Thank you in advance.

Respectfully submitted,

/s/

Rodney Villazor, Esq.  
SMITH VILLAZOR LLP

Hon. Michael A. Hammer

July 28, 2022

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